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November 6, 2023

Via ECF

The Honorable Lorna G. Schofield
United States District Judge
United States District Court, SDNY
40 Foley Square
New York, NY 10007

Application **GRANTED**. By **November 7, 2023**, the parties shall file their joint status letter identifying any remaining discovery and plans to complete it by the scheduled deadlines, along with a proposed briefing schedule for any motion for summary judgment.

Dated: November 7, 2023
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Request for Extension of Time to File Joint Status Letter*
Elizabeth Valdez v. Ordela, LLC and Wingstop Restaurants Inc.; 1:23-Civ-2737 (LGS)

Dear Judge Schofield:

We represent the plaintiff in the above-entitled action. We write to respectfully request an extension of time, to November 7, 2023, for the parties to file the joint status letter required by Your Honor's Order of October 20, 2023 (ECF No. 52). This is the second request for an extension of time. The parties previously requested an extension of the deadline to file the joint letter (ECF No. 55), and the Court granted the parties' request, extending the deadline to Friday, November 3, 2023 (ECF No. 56).

The reason for plaintiff's request is that the defendants refused to sign off on the joint letter plaintiff circulated on Friday, November 3, 2023. Defendants refused to sign off on the joint letter even though the parties' respective positions were explicitly delineated in the letter.¹

Although the defendants requested, and received plaintiff's consent for an extension of time, they failed to request the Court's permission to extend the deadline to file the joint letter. Accordingly, plaintiff apologizes to the Court for the belated request and respectfully requests another extension of time, until November 7, 2023, to file the joint status letter.

Thank you for your time and attention to this matter. With kindest regards, I am

very truly yours,

/s/

Robert G. Hanski, Esq.

¹ Plaintiff can provide the referenced joint letter to the Court should the Court desire to review it.